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May 30, 2025

VIA EMAIL

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

During proceedings this afternoon, the Court indicated it would allow the government to oppose the defense's Rule 17 subpoena applications for certain communications of witnesses Deonte Nash and Mia by Sunday, June 1. Since Mia is still on the stand, we respectfully request that the Court direct the government to submit any opposition by tomorrow, rather than Sunday, so that a ruling can be issued before the weekend is over, at least as to that subpoena. Mia's testimony will resume on Monday, and a ruling before Monday is critical to ensure that, if the Court grants the application, the defense can obtain any responsive materials and make use of them while Mia is still on the stand.

Additionally, we note that although the government has advised us that Ms. Ventura's counsel seeks to intervene, claiming that this subpoena seeks "the production of personal or confidential information about a victim," under Rule 17(c)(3), the communications at issue do not qualify because we are not seeking "such things as medical or school records," Advisory Committee Notes, 2008 Amendment, but rather, communications about this very case. In any event, if the Court has any concerns on this score, the defense would have no objection if the Court were to direct Mia to produce the materials to the Court for in camera review of any claim that they contain "personal or confidential information" not relevant to this case before they are disclosed to the defense.

Respectfully submitted,

/s/Alexandra A.E. Shapiro

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